

June 16, 2006

Dear Federal Trade Commission Officer:

I am writing in response to the proposed **Business Opportunity Rule, R511993**.

*The seven day waiting period* is unrealistic for my business. A prospective purchaser cannot sign a contract or make a payment until seven days elapses from the time she was given all the required disclosures. This waiting period is cruel to those who need the product I'm selling for well-being. I recruit people on the road, in my backyard, or anywhere, it's the beauty of the business. The company that I represent abides by outstanding consumer protection and I know that if I were told I'd have to wait seven days for a prescription, seven days for a pair of running shoes that I need to run in a marathon three days from now, I would be negatively impacted. We live in a fast paced society and we aren't selling guns (although this law has expired). It will be easier to buy a gun than buy a product that will make my customers feel "warm and fuzzy" or relieved/beneficial. The waiting period suggests a level of risk that doesn't exist in my business and many other direct selling companies. It is impractical. My company requires a minimal up-front financial fee (\$35), similar to Costco, and has a generous buyback policy which presents little or not risk to prospective purchasers.

*The list of references:* It is my understanding that this may be in direct conflict with already existing federal laws protecting privacy. People who intend to purchase my product, or who have purchased my product will have their names, addresses, and phone numbers available to the general public under this bill. This is like going to the pharmacy and asking to see the last ten name of those receiving medication, recording their names, phone numbers, and addresses. This also can introduce crime in sharing these names and contact information. Stalkers and emotionally unstable people live in all communities and this is one of the reasons the Department of Motor Vehicles has tightened up on giving out information on drivers, including their addresses back in the late 1980s early 1990s. This is a breach of privacy and limits my business to a set geographical region to do my business. This also introduces my purchasers to the realm of harassment by those who have no intent to buy, but are walking on the fringes of predator/prey behavior. It also makes identity theft easier. In addition, it would be easy for a fraudulent company to provide a list of "references" but extremely burdensome on legitimate direct selling business.

*Earnings claim statement:* This will not deter crime. A fraudulent company will not provide accurate data, while legitimate business opportunity sellers will have difficulty in meeting the proposed requirements.

*Legal Actions:* Not only would this rule require disclosure of litigation potentially unrelated to the business opportunity transaction, but it doesn't provide for disclosure of the outcome of the litigation. Thus, litigation that was favorably resolved for the distributor, or is otherwise irrelevant to the recipient of the disclosures, would still need to be provided. At the very least this requirement should be modified to take into account these problematic elements.

Don't call us all bad apples, because we aren't. Keeping the safety of our prospective customers in mind is the first and foremost and I hope you will see benefits to protecting their privacy. I understand that there are fraudulent groups out there, but this particular rule unfairly targets legitimate direct selling businesses.

Thank you for the opportunity to comment on this.

Abundance Now, LLC

Please do not disclose my address.